

OFFICIAL FILE

ORIGINAL

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

CITY OF CHICAGO,  
PEOPLE OF COOK COUNTY

Petition for Emergency Rulemaking  
and Expedited Investigation

)  
)  
)  
)  
)

Docket No. 00-0789

**PETITION FOR LEAVE TO INTERVENE OF  
NORTHERN ILLINOIS GAS COMPANY d/b/a NICOR GAS**

Northern Illinois Gas Company d/b/a Nicor Gas ("Nicor Gas") respectfully seeks leave to intervene in the above-captioned proceedings and, in support thereof, states as follows:

1. Nicor Gas is an Illinois corporation with its General Office at 1844 Ferry Road, Naperville, Illinois 60563 (Mailing Address: Post Office Box 190, Aurora, Illinois 60507-0190). Nicor Gas's telephone number is: (630) 983-8676. Nicor Gas is engaged in the business of distributing and selling natural gas in the northern part of Illinois, and is a public utility within the meaning of the Illinois Public Utilities Act, 220 ILCS 5/1-101 et seq.

2. This proceeding was initiated by the City of Chicago and the People of Cook County ("Petitioners") to immediately initiate an emergency rulemaking proceeding to amend 83 Illinois Administrative Code Part 280 to "alleviate the impact of drastically increased natural gas prices on consumers." Petitioners also seek an expedited investigation of the budget-billing practices of Illinois gas utilities.

3. Because Nicor Gas is in the business of distributing and selling natural gas in the northern part of Illinois, Nicor Gas has a direct interest in, and may potentially be affected by, the determinations of the Commission in this proceeding.

4. No other party to this proceeding can adequately represent the interests of Nicor Gas.
5. The intervention of Nicor Gas will not delay the proceeding.
6. Nicor Gas requests that the following persons be placed on the official service list in this proceeding:

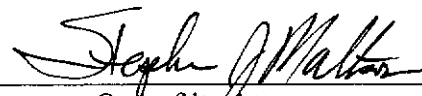
Stephen J. Mattson  
Angela D. O'Brien  
MAYER, BROWN & PLATT  
190 South LaSalle Street  
Chicago, IL 60603

Rocco D'Allesandro  
Northern Illinois Gas Company d/b/a Nicor Gas  
1844 Ferry Road  
Naperville, IL 60563

WHEREFORE, Nicor Gas respectfully requests leave to intervene in the above-captioned proceeding.

Respectfully submitted,

NORTHERN ILLINOIS GAS  
COMPANY d/b/a NICOR GAS

By:   
One of its Attorneys

Stephen J. Mattson  
Angela D. O'Brien  
MAYER, BROWN & PLATT  
190 South LaSalle Street  
Chicago, Illinois 60603  
(312) 782-0600

Dated: December 21, 2000

STATE OF ILLINOIS     )  
                                  )  
COUNTY OF COOK     )     SS

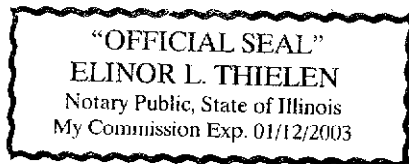
Stephen J. Mattson, being duly sworn, deposes and says that he is one of the attorneys for Northern Illinois Gas Company d/b/a Nicor Gas, that he has read the foregoing Petition for Leave to Intervene and has knowledge of the contents thereof, and that the matters set out therein are true in substance and in fact.

Stephen J. Mattson

SUBSCRIBED AND SWORN to  
before me this 21st day of  
December, 2000.

Elinor L. Thielen  
Notary Public

My Commission Expires:



**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that the foregoing Petition for Leave to Intervene of Northern Illinois Gas Company d/b/a Nicor Gas was served on all parties listed below via facsimile or U.S. Mail, First Class, postage prepaid on this 21st day of December, 2000.

  
\_\_\_\_\_

**SERVICE LIST**  
**DOCKET NO. 00-0789**

Erin M. O'Connell-Diaz  
Hearing Examiner  
Illinois Commerce Commission  
160 North LaSalle Street  
Suite C-800  
Chicago, IL 60601

Gerard T. Fox  
James Hinchliff  
Matthew A. Greene  
Mary Klyasheff  
Timothy P. Walsh  
North Shore/Peoples Gas  
130 East Randolph Drive  
23<sup>rd</sup> Floor  
Chicago, IL 60601

Ronald D. Jolly  
Assistant Corporation Counsel  
City of Chicago  
30 North LaSalle Street  
Suite 900  
Chicago, IL 60602

Conrad Reddick  
City of Chicago  
Suite 1040  
30 North LaSalle Street  
Chicago, IL 60602

Leijuana Doss  
Marie Spicuzza  
Assistant State's Attorneys  
Cook County State's Att. Office  
69 West Washington Street  
Suite 700  
Chicago, IL 60602

Karen M. Huizenga  
MidAmerican  
106 East Second Street  
Davenport, Iowa 52801

Joseph L. Lakshmanan  
Illinois Power Company  
500 South 27<sup>th</sup> Street  
Decatur, IL 62521